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Plaintiff in Pro Per

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

**Arjun Vasan,**  
Plaintiff and Counter-Defendant

vs.

**Checkmate.com, Inc.,**  
(dba "Checkmate"),  
Defendant and Counterclaimant

Case No.: 2:25-cv-00765-MEMF-JPR  
Hon. Maame Ewusi-Mensah Frimpong

**DECLARATION OF ARJUN VASAN  
AUTHENTICATING EXHIBITS**

Complaint Filed: January 28, 2025  
Hearing Date: ~~October 9, 2025~~  
Hearing Time: 10:00 a.m.

I, Arjun Vasan, declare as follows:

1. I am the Plaintiff and Counter-Defendant in this action and submit this declaration in support of my Objection and [Proposed] Reply ("Reply") to Defendant Checkmate.com, Inc.'s Opposition to my Motion to Dismiss its Counterclaims. I have personal knowledge of the facts stated herein, and if called to testify could and would do so competently.
2. I submit this Declaration to Authenticate Exhibits filed with my Reply, including PACER filings, and correspondence with counsel.

3. All exhibits filed herein have been filed in this dispute, either in the Southern District of New York, or here in the Central District of California.
4. I obtained court filings from PACER as PDF files; I removed only the repeating ECF header/footer bands and added/updating cover sheets as appropriate. I exported emails I sent or received from my Gmail account to PDF. Except for highlighting/underlining for emphasis and those cover sheets; no text or content was altered. The PDFs show the sender, recipients, subject line, date/time, and message body as received.
5. I recognize the attached emails based on their distinctive characteristics—addresses, signature blocks, subject lines, message threads, and timing—and my personal knowledge of the exchanges. See Fed. R. Evid. 901(b)(1), (b)(4). Emails authored by Checkmate or its counsel are also opposing-party statements. See FRE 801(d)(2)(C)–(D).
6. **Exhibit A** contains true and correct copies of the following from the SDNY action:
  1. **Ex. A-1**: Declaration of Thomas Warns (SDNY ECF 40);
  2. **Ex. A-2**: Assignment of Intellectual Property and Other Assets (IPAA);
  3. **Ex. A-3**: IP Acknowledgement Letter (IPAL).
  4. The remaining attachments are available on PACER for the court’s reference.
7. **Exhibit B** details a sequence of events at the onset of this litigation, including a Jan 29 Notice from Checkmate to Robert Nessler and a Feb 7 Response to the same:
  1. **Ex. B-1** is a true and correct copy of my February 6, 2025, email thread with Grant Thomas attaching the aforementioned Notice and draft Response.
  2. **Ex. B-2** is a true and correct copy of the January 29, 2025, Notice of Direct Claim served on Robert Nessler and forwarded to me by Mr. Thomas — attorney for Mr. Nessler in his capacity as Holder Representative under the Merger Agreement between Checkmate and VoiceBite.
  3. **Ex. B-3** is a true and correct copy of the Shareholder Response drafted by Mr. Thomas, to be sent on February 7, 2025.
8. **Exhibit C** contains true and correct copies of the following filed with Checkmate’s Motion to Dismiss or Transfer (Dkt. 18-4):

1. **Ex. C-1:** Declaration of Vishal Agarwal (Dkt.18-4), which authenticates C-2, C-3 and C-4 below;
  2. **Ex. C-2:** Bonus Agreement (Exhibit C to the Agarwal Decl.; *Id.* at 61);
  3. **Ex. C-3:** Offer Letter (Exhibit D to the Agarwal Decl.; *Id.* at 69).
  4. **Ex. C-4:** Lunchbox Emails (Exhibit E to the Agarwal Decl.).
  5. The remaining attachments are available on PACER for the court's reference.
9. **Exhibit D** contains true and correct copies of the following December 2024 to January 2025 correspondence with Attorney Ryan Q. Keech for Checkmate.
1. **Ex. D-1** My November 20, 2024, request for unpaid severance and bonuses (aligned w/Offer Letter) after my termination on November 14, 2024.
  2. **Ex. D-2** The first "Notice of Claim" sent by Mr. Keech on December 6, 2024, rejecting my request and alleging "unprofessional" and "criminal" misconduct.
  3. **Ex. D-3** Emails I sent on December 15 and December 21, 2024, requesting the documents alleged to be breached in the Notice of Claim.
  4. **Ex. D-4** The second "Notice of Claim" sent by Mr. Keech on January 22, 2025, repeating the allegations, referring to "criminal liability", and to my earlier refusal to "submit" to a recorded interview.
10. **Exhibit E** contains a true and correct copy of the Declaration of Robert Nessler, filed in the SDNY action at SDNY ECF No. 58-1

*I Declare under Penalty of Perjury under the laws of the United States and the State of California that the foregoing is True and Correct.*

Respectfully Submitted,

Executed on: September 25, 2025

/s/ *Arjun Vasani*

In Cerritos, California

*By:* **Arjun Vasan**  
Plaintiff In Pro Per